

**UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF MASSACHUSETTS
EASTERN DIVISION**

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JUNE NOELLE WILLIAMS)	
)	
)	Chapter 13
)	Case No. 24-11123-JEB
Debtor)	
)	
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**DEBTOR’S RESPONSE TO
ORDER TO SHOW CAUSE (ECF DOC #76)**

Now comes, June-Noelle Williams, (“Debtor”) by and through undersigned counsel, Glenn F. Russell, Jr., and who herein respectfully files her Response to this Court’s Order of January 02, 2025 to Show Cause why this matter should not be dismissed for unreasonable delay.

The Court correctly identified that the Chapter 13 Trustee’s principal Objections concerned the failure to provide accurate information regarding her income, included information on her schedules that is inconsistent with her Section 341 testimony, and failed to provide information [regarding income] to the Trustee. In support of the Debtor’s position, the undersigned will state the reasons for the present situation below.

Undersigned states that he has reached out and discussed the fact with the Trustee’s Office that apparently the Debtor’s husband failed to disclose to the Debtor that he was, in fact, still receiving social security disability income, as well as social security benefits for both of the Debtor’s children. The preceding caused the discrepancy between the Debtor’s 341 testimony and her schedules. In fact, the Debtor’s husband affirmatively

disavowed any continued receipt of said income, and therefore the Debtor's testimony failed to reflect this fact.

Undersigned has attempted to acquire the Trustee's requested information, which necessarily is dependent upon cooperation from the Debtor's husband, which has taken some time to receive, and to which has unfortunately caused the unanticipated delay in transmitting the same to the Trustee. Undersigned, has [since this Court's January 02, 2025 Order] sent evidence of the Debtor's husband's income as a van driver to the Trustee via the Trustee's document portal. The undersigned has further sent documentary indicia regarding the Debtor's husband's 2023 Social Security 1099 for himself and one of his two children and is still awaiting receipt of the 2023 Social Security 1099 for the second child.

The undersigned sincerely apologizes for mis-calendaring the last hearing in this matter and responded to the Chapter 13 Trustee's email regarding the same, to apologize for such error and to state that he was aghast at such omission, and also to confirm that the undersigned would present the Amended Plan for the Trustee's review prior to filing the same. Undersigned, in fact, did follow this Court's directive, and submitted the Amended Plan to the Trustee for review, who provided further guidance after review of the same.

Undersigned prays for this Court's understanding, as apparently there may exist marital issues between the Debtor and her husband that has caused the Debtor to lack scienter regarding the entirety of the entire present financial picture of her household. The preceding also required the undersigned to rely upon production of documents from the non-filing spouse, which therefore caused the delay in conveying the same to the Trustee.

Undersigned, intends to have filed the Debtor's Amended Plan, Amended

Schedule I [along with Motions for the same], to conform with this Court's January 02, 2025 Order.

WHEREFORE, the Debtor, by and through her counsel, Glenn F. Russell, Jr., respectfully prays for the Court's understanding regarding the particular issues and fact pattern presented in this matter and further prays that the Court take into consideration the fact that the Debtor relies upon information that was never disclosed to her and that apparently was solely in possession of the non-filing spouse.

Respectfully submitted,

Attorney for the Debtor

/s/ Glenn F. Russell, Jr.
Glenn F. Russell, Jr.
BBO: 656914
38 Rock Street, Suite #12
Fall River, MA 02720
(888) 400-9318
russ45eq@gmail.com

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In Re:)	
)	
JUNE-NOELLE WILLIAMS)	
)	Chapter 13
)	Case No. 24-11123-JEB
Debtor)	
)	
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CERTIFICATE OF SERVICE

I, Glenn F. Russell, Jr., do hereby certify that on the 14th day of January 2025, I served the Debtors' Response to the Court's January 02, 2025 Order to Show Cause, to the following parties via electronic mail and submission to the ECF System, and/or by USPS postage prepaid to the following:.

Assistant U.S. Trustee

John Fitzgerald

Office of the US Trustee

J.W. McCormack Post Office & Courthouse

5 Post Office Sq., 10th Fl, Suite 1000

Boston, MA 02109

Trustee

Carolyn Bankowski

Ch 13-12 Trustee Boston

P. O. Box 8250

Boston, MA 02114

617-723-1313

AmeriCredit Financial Services, Inc.

dba GM Financial

PO Box 183853

Arlington, TX 76096

Brock and Scott, PLLC

Attorneys at Law
3825 Forrestgate Dr.
Winston-Salem, NC 27103

Capital One

PO Box 31293
Salt Lake City, UT 84131-0293

Capital One

Attn: Bankruptcy
PO Box 30285
Salt Lake City, UT 84130-0285

Capital One

Attn: Bankruptcy
PO Box 30
Salt Lake City, UT 84130-0285

Credit One Bank

PO Box 98872
Las Vegas, NV 89193-8872

Credit One Bank

Attn: Bankruptcy Department
6801 S Cimarron Rd
Las Vegas, NV 89113-2273

Fortiva

PO Box 105555
Atlanta, GA 30348-5555

Fortiva

Attn: Bankruptcy
PO Box 105555
Atlanta, GA 30348-5555

Genesis Fs Card Services

Attn: Bankruptcy
PO Box 4477
Beaverton, OR 97076-4401

Genesis Fs Card Services

PO Box 4499
Beaverton, OR 97076-4499

Global Lending Services LLC

Attn: Bankruptcy
PO Box 10437
Greenville, SC 29603-0437

Global Lending Services LLCAL

1200 Brookfield Blvd
Ste 300
Greenville, SC 29607-6583

Gm Financial

Attn: Bankruptcy
PO Box 183853
Arlington, TX 76096-3853

Gm Financial

PO Box 181145
Arlington, TX 76096-1145

LVNV Funding, LLC

Resurgent Capital Services
PO Box 10587
Greenville, SC 29603-0587

Shellpoint Mortgage Servicing

Attn: Bankruptcy
PO Box 10826
Greenville, SC 29603-0826

Shellpoint Mortgage Servicing

601 Office Center Dr
Fort Washington, PA 19034-3275

/s/ Glenn F. Russell, Jr.

Glenn F. Russell, Jr.